

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In Re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation

Master File No. 1:00-1898
MDL 1358 (SAS)
M21-88
ECF Case

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This document relates to the following case:

City of Pomona v. Chevron USA, Inc., et al.
Case No. 09 Civ. 3738

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**PLAINTIFF CITY OF POMONA'S DISCLOSURE OF IDENTIFIED SOURCES OF
MTBE CONTAMINATION**

Pursuant to Case Management Order No. 60, Plaintiff City of Pomona hereby makes the following disclosure of identified sources of MTBE¹ contamination in Plaintiff's well. This initial disclosure is made with the following reservations expressly stated:

1. Discovery in this matter is ongoing. Plaintiff may discover that additional stations/facilities are substantial factors in causing MTBE contamination in Plaintiff's well and Plaintiff reserves the right to supplement or amend this list accordingly.
2. Plaintiff reserves all rights to supplement or amend this disclosure.
3. By making this disclosure, Plaintiff is in no way representing that all of the sources of MTBE in Plaintiff's well are identified below. There may be orphan plumes emanating from fugitive tanks, surface spills or other unaccounted for sources that are not discoverable based on a reasonable investigation.
4. Expert discovery has not yet commenced. Plaintiff hereby reserves the right to supplement or amend this disclosure as a result of the expert discovery process.

¹ As used herein "MTBE" refers to methyl tertiary butyl ether and its degradation byproducts including tertiary butyl alcohol.

5. Expert disclosures are not due yet. This disclosure is not and is in no way intended to be an expert disclosure.

Subject to and without waiving the limitations and reservations set forth above, Plaintiff hereby responds as follows:

Site Name²	Address	City
ARCO - AM/PM MINIMARKET #6221	12100 RAMONA	CHINO
ARCO #5550	2488 RESERVOIR ST. S.	POMONA
ARCO #9553	1510 GAREY AVE S	POMONA
ARCO STATION & KIKI'S ARCO SERVICE STATION	2087 RESERVOIR ST. S.	POMONA
CAL PACIFIC POULTRY	970 PHILLIPS BLVD E	POMONA
CHEVRON #9-1158	12345 RAMONA BLVD	CHINO
CONTINENTAL BAKING COMPANY	2801 TOWNE AVE S	POMONA
DON'S DRY CLEANERS	1773 NORTH GAREY AVENUE	POMONA
EXXONMOBIL OIL CORP.	2498 GAREY AVE. S.	POMONA
FARMERS MARKET & DELI	3707 RIVERSIDE DRIVE	CHINO
FDS MANUFACTURING	2200 RESERVOIR ST S	POMONA
FOOTHILL BEVERAGE INC.	2800 RESERVOIR ST	POMONA
GTE CALIFORNIA	2888 FICUS ST	POMONA
HOUSER COMPANY	2087 TOWNE AVE S	POMONA
HUMPHRIES FAMILY PARTNERSHIP	4702 RIVERSIDE DRIVE	CHINO
JACK JONES TRUCKING, INC.	3561 PHILADELPHIA ST	CHINO
JAGUR TRACTOR	3625 PHILADELPHIA ST	CHINO
LOS ANGELES COUNTY FIRE STATION #181	540 S PARK AVE	POMONA
MOBIL OIL CORP S/S #18-H82	2498 S GAREY AVE	POMONA
MOBIL STATION #18-BK7	3295 GRAND AVENUE	CHINO HILLS
OSTERKAMP TRUCKING	1350 PHILADELPHIA ST. E.	POMONA

² Please note that certain locations may have undergone name changes and/or may have been converted to different uses. These names are provided for convenience and should not be read as a limitation.

POMONA SHELL PARTNERS	2500 S GAREY AVE	POMONA
R AND M FUEL STOP	4421 PHILADELPHIA AVE	CHINO
RIO RANCHO PONTIAC GMC BUICK	15 AUTO CENTER DR	POMONA
RUGBY FACILITY (FORMER)	2855 RESERVOIR ST. S.	POMONA
SC FUELS #112	3501 COUNTY ROAD	CHINO
SCOTT BROTHER'S DAIRY	12000 EAST END AVE	CHINO
SCOTT'S DAIRY	4508 RIVERSIDE DR	CHINO
SHELL	2500 GAREY AVE. S	POMONA
SHELL SERVICE STATION & TEXACO/EQUILON #61-106-2048	2741 TOWNE AVENUE S./ 2741 S TOWNE AVE	POMONA
TEXACO STAR MART	3310 GRAND AVENUE	CHINO HILLS
THRIFTY #312/ARCO #9684	2475 GAREY AVE S	POMONA

Dated: San Francisco, California
April 30, 2010

ARNOLD M. ALVAREZ-GLASMAN
City Attorney, City of Pomona
ALVAREZ-GLASMAN & COLVIN
13181 Crossroads Parkway North
Suite 400 – West Tower
City of Industry, CA 91746
(562) 699-5500

/s/ NICHOLAS G. CAMPINS
VICTOR M. SHER (*pro hac vice*)
NICHOLAS G. CAMPINS (*pro hac vice*)

SHER LEFF LLP
450 Mission Street, Suite 400
San Francisco, CA 94105
(415) 348-8300

Scott Summy (*pro hac vice*)
Carla M. Burke
Celeste A. Evangelisti (*pro hac vice*)
David T. Ritter (*pro hac vice*)
BARON & BUDD, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219-4281
(214) 523-6267

Attorneys for Plaintiff City of Pomona

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **PLAINTIFF CITY OF POMONA'S DISCLOSURE OF IDENTIFIED SOURCES OF ALLEGED MTBE CONTAMINATION** was served on Liaison Counsel via Electronic Mail, and on all counsel of record by posting it directly to CM/ECF and LexisNexis File & Serve on the 30th day of April, 2010.

_____*JEFF OSBUN*_____
JEFF OSBUN